

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.;  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS; VERIZON SERVICES CORP.;  
VERIZON ENTERPRISE SOLUTIONS, LLC;  
VERIZON BUSINESS GLOBAL LLC;  
VERIZON BUSINESS NETWORK  
SERVICES, LLC; VERIZON CORPORATE  
SERVICES GROUP INC.; VERIZON DATA  
SERVICES, LLC; VERIZON MEDIA INC.;  
and VERIZON ONLINE, LLC,

Defendants.

Case No. 2:20-CV-280- JRG

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF ORDER REGARDING E-DISCOVERY**

Plaintiff and Defendants (collectively, “the Parties”), respectfully submit this Joint Motion to Enter the Order regarding E-Discovery (a proposed order is attached hereto as Exhibit 1).

Respectfully submitted,

/s/ Robert Christopher Bunt

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Respectfully submitted:

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*Counsel for Defendants Verizon Communications Inc.; Cellco Partnership d/b/a Verizon Wireless; Verizon Services Corp.; Verizon Enterprise Solutions, LLC; Verizon Business Global, LLC; Verizon Business Network Services, LLC; Verizon Corporate Services Group Inc.; Verizon Data Services, LLC; Verizon Media Inc.; and Verizon Online, LLC*

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed electronically on May 26, 2021 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

*/s/Robert Christopher Bunt*  
Robert Christopher Bunt

**CERTIFICATE OF CONFERENCE**

I certify that counsel for the parties have complied with the meet and confer requirement in Local Rule CV-7(h) and jointly file this unopposed motion.

*/s/Robert Christopher Bunt*  
Robert Christopher Bunt